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13 Proposed Attorneys for
The Roman Catholic Archbishop of San Francisco

14
15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re:
18 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,
19
20 Debtor and
Debtor In Possession.

CASE NO. 23-30564

Chapter 11

**NOTICE OF HEARING ON MOTION OF
DEBTOR FOR AUTHORITY TO EMPLOY
AS OF THE PETITION DATE AND
PROVIDE COMPENSATION TO
PROFESSIONALS USED IN THE
ORDINARY COURSE OF BUSINESS [11
U.S.C. §§ 105(a), 327, 328, and 330]**

Date: October 12, 2023
Time: 1:30 p.m.
Place: Via ZoomGov
25 Judge: Hon. Dennis Montali

26 **NOTICE IS HEREBY GIVEN** that the Roman Catholic Archbishop of San Francisco,
27 Debtor and Debtor-in-Possession herein ("Debtor"), has filed a *Motion for Authority to Employ as*
28 *of the Petition Date and Provide Compensation to Professionals Used in the Ordinary Course of*

Case No. 23-30564

NOTICE OF HEARING ON MOTION TO EMPLOY
ORDINARY COURSE PROFESSIONALS

1 *Business* (the “Motion”) and that a hearing on the Motion is scheduled before the Honorable Dennis
2 Montali on October 12, 2023, at 1:30 p.m. at the United States Bankruptcy Court, Northern District
3 of California, San Francisco Division, before the Honorable Dennis Montali (the “Hearing”). The
4 Hearing will not be conducted in the presiding judge’s courtroom but instead will be conducted by
5 videoconference via ZoomGov. The Bankruptcy Court’s website provides information regarding
6 how to arrange an appearance at a video or telephonic hearing. If you have questions about how to
7 participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or
8 by using the Live Chat feature on the Bankruptcy Court’s website. The link to the judge’s electronic
9 calendar is: <https://www.canb.uscourts.gov/judge/montali/calendar>.

10 **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of*
11 *Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [Dkt. 14],
12 the *Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and Debtor’s Emergency*
13 *Motions* [Dkt. 15], the *Declaration of Joseph J. Passarello* in support of the Motion the exhibits in
14 support thereof, and the court’s filings and records in this case.

15 By the Motion, the Debtor seeks, pursuant to sections 105(a), 327, 328, 330, 363(b) and
16 1108, of title 11 of the United States Code, entry of an order authorizing, but not directing, the
17 Debtor to (i) establish certain procedures to retain and compensate those professionals that the
18 Debtor employs in the ordinary course of business (collectively, the “Ordinary Course
19 Professionals”), effective as of the Petition Date (as defined in the Motion), without (a) the
20 submission of separate retention applications or (b) the issuance of separate retention orders by the
21 Court for each individual Ordinary Course Professional; and (ii) compensate and reimburse
22 Ordinary Course Professionals without individual fee applications.

23 The Debtor seeks to employ and pay Ordinary Course Professionals to render professional
24 services to the Debtor’s estate in the same manner and for the same or similar purposes as such
25 professionals were retained by the Debtor prior to the Petition Date. In the past, Ordinary Course
26 Professionals have provided the Debtor with specialized legal, accounting, professional consulting
27 and recruiting and other services relating to, among other things, pension legal compliance,
28 employment matters, accounting and auditing, actuarial, and plan administration, 403(b) plan

1 consulting immigration and canon law consulting that support the Debtor's ordinary day to-day
2 operations. The requested authority for amounts to be paid without separate application would be
3 limited to \$15,000 per month and/or \$45,000 per quarter per professional, with the exception of the
4 Debtor's auditors, investment advisors and recruiters who are paid at certain milestones or quarterly
5 instead of monthly and may be entitled to payments greater than \$15,000 as detailed in Exhibit 1
6 attached to this Notice of Hearing and to the Proposed Order attached to the Motion, including an
7 annual audit fee of \$132,000 payable to BPM LLP. It is essential that the employment of Ordinary
8 Course Professionals, many of whom are familiar with the Debtor's business, be continued to avoid
9 disruption of the Debtor's operations during this Chapter 11 Case.

10 If approved, the procedures will require the Debtor to file a declaration and questionnaire
11 for each proposed professional, subject to opportunity to object, and to file quarterly statements
12 disclosing all payments.

13 The Debtor submits that the proposed employment of the Ordinary Course Professionals
14 and the payment of monthly compensation pursuant to the procedures set forth below (the
15 "Procedures") are in the best interests of the estate, creditors, and all other parties in interest. The
16 relief requested will save the Debtor the time and expense associated with applying to the Court
17 separately to retain each Ordinary Course Professional, and will avoid the incurrence of additional
18 fees for the preparation and prosecution of numerous interim and final fee applications during this
19 Chapter 11 Case, which relate to relatively modest compensation expenses. Accordingly, the
20 Debtor requests that the Court dispense with the requirement of filing individual retention and fee
21 applications for the Ordinary Course Professionals and authorize the Procedures, as defined in the
22 Motion.

23 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the
24 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.
25 For further specifics concerning the Motion and the relief requested, you are encouraged to review
26 the Motion and the supporting evidence, including the supporting Declarations, copies of which
27 may be obtained from the website to be maintained by the Debtor's proposed Claims and Noticing
28 Agent, Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/RCASF>, free of charge.

1 You may also access these documents from the Court's Pacer system (requires a subscription). The
2 web page address for the United States Bankruptcy Court for the Northern District of California is
3 <http://www.canb.uscourts.gov>.

4 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be
5 in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the above-
6 referenced addresses so as to be received by September 28, 2023. Any opposition or response must
7 be filed and served on the Limited Service List as provided in the Interim Order Approving Motion
8 to (1) Establish Notice Procedures, (2) File Confidential Information Under Seal, and (3)
9 Temporarily Suspend Deadline for Filing Proofs of Claim at Docket No. 38. The current updated
10 Limited Service List may be obtained from the Omni website listed above. Failure to file timely
11 opposition and appear at the hearing may constitute a waiver of your objections. Your rights may
12 be affected. You should read these papers carefully and discuss them with your attorney, if you
13 have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

14 Dated: September 14, 2023

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

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16 By: /s/ Paul J. Pascuzzi
PAUL J. PASCUZZI
17 Proposed Attorneys for The Roman
Catholic Archbishop of San Francisco,
18 a California corporation sole
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EXHIBIT 1

Exhibit 1

Initial List of Ordinary Course Professionals

Name	Address	Professional Service	Estimated Amount
Legal			
Allen, Glaessner, Hazelwood & Werth LLP	180 Montgomery Street, Suite 1200, San Francisco, CA 94104	Legal advice and representation in litigation concerning non-abuse matters.	\$10,000 per month
Best Best & Krieger LLP	3390 University Ave 5th Fl. Riverside, CA 92502	Legal Advice concerning Pension/403B plans	\$2,000 per month
Jackson Lewis LLP	50 California Street, 9 th Floor, San Francisco, CA 94111	Legal advice and representation in employment litigation matters	\$5,000/mo.
Littler Mendelson, PC	333 Bush Street, 34 th Floor, San Francisco, CA 94104	Legal services concerning employment and union matters	\$2,000 month
Rankin Stock Heaberlin O'Neal	93 N. 3 rd Street, #500, San Jose, CA 95112	Litigation	\$5,000/mo.
Financial/Accounting			
Beacon Pointe LLP	24 Corporate Plaza Drive, Suite 150 Newport Beach, CA 92660	Investment Advisor	\$36,000 per quarter
BPM LLP	One California Street, Suite 2500, San Francisco, CA 94111	CPA Firm for Audits Chancery/ Central Administrative Offices	Unbilled portion for FY'23 Audit \$132,000
Nicolay Consulting Group Inc.	231 Sansome St. Suite 300 San Francisco, CA 94104	Pension Plan consulting and actuarial services for pension plans	\$6,000 per quarter
Grant Thornton LLP	101 California Street, Suite 2700, San Francisco, CA 94111	UBIT Tax Consulting	\$10,000 initial payment and

			\$10,000 upon completion
Global Retirement Partners – Heffernan Retirement Services	4340 Redwood Hwy, Ste B60, San Rafael, CA 94903	403B Plan Advisor	\$14,000 per Quarter
Other			
Stewardship Planned Giving	6713 Old Jacksonville Highway, Suite 105 Tyler, Texas 75703	Consulting for Planned Giving	\$8,000 month over 4 months
Korn Ferry	One Montgomery Street, Suite 2200 San Francisco, CA 94104	Executive Search Consultant	\$16,000 flat fee
Executive Search Recruiting Firm(s)	TBD	Assist with recruiting for Superintendent Position	\$80,000 (payable in 3 installments at engagement, submission of vetted candidates, & placement of candidate)